

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 3:09cr145
	§	
PRESTON PETITT	§	

**FACTUAL RESUME**

The defendant, Preston Petitt, his attorney, Walt Herring, and the United States of America agree to the law and facts as follows:

**ELEMENTS OF THE OFFENSE**

Conspiracy to Transport Individuals for Prostitution  
[Violation of 18 U.S.C. § 371 (18 U.S.C. § 2421)]

In order to prove the offense of Conspiracy to Transport Individuals for Prostitution, as alleged in Count One of the Indictment, the government must prove each of the following elements beyond a reasonable doubt:

- First:* That the defendant and at least one other person made an agreement to commit the crime of transportation for prostitution, as charged in the indictment;
- Second:* That the defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose; and

*Third:* That one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the indictment, in order to accomplish some object or purpose of the conspiracy.

### **STIPULATED FACTS**

MARCUS CHOICE WILLIAMS held himself out to be a “pimp” in the prostitution “game” and that he, KENYA LEEANN THOMAS and PETITT directly and/or indirectly transported, or aided and abetted the transportation, of individuals within interstate commerce. WILLIAMS advertised prostitution services on the internet at www.PrivateBash.com, offering services within the “Boston-DC-Dallas” areas. PETITT’s involvement with WILLIAMS began in February of 2007, after Williams had already been involved in prostitution. PETITT was hired by WILLIAMS to bolster WILLIAMS’ appearance as an important player in the prostitution “game.” Although PETITT accompanied WILLIAMS to social events featuring other pimps to play the role of butler/body guard, his primary role was to cook, clean, and provide au pair services for WILLIAMS’ children, as well as THOMAS’ children, and the children of the last two women transported by WILLIAMS for the purpose of prostitution.

In or about June of 2007, WILLIAMS took “K.D.” and her young daughter to an apartment, rented in PETITT’S name. WILLIAMS then called PETITT and THOMAS to the apartment to retrieve K.D.’s daughter. PETITT took K.D.’s daughter back to WILLIAMS’ house in Little Elm, TX, and THOMAS remained at the apartment to

"coach" K.D. about the rules of working for www.PrivateBash.com.

After approximately two-weeks, WILLIAMS took K.D. to Washington, DC, where she prostituted alongside THOMAS. PETITT met up with them on the trip and maintained custody and control of K.D.'s daughter, as well as the children of WILLIAMS and THOMAS, to ensure that the mothers were available to commit acts of prostitution in nearby hotels and, on occasion, in an adjoining hotel room. After PETITT took the children and returned to Texas, K.D. continued prostituting for WILLIAMS. After learning that PETITT had returned her daughter to the home of the child's grandmother, K.D. escaped from WILLIAMS and THOMAS as they slept in hotel room next door. WILLIAMS then contacted PETITT and informed him that "the bitch blew."

Within days, WILLIAMS began to call K.D. and she agreed to meet him in a public place. WILLIAMS declared that PETITT would pick her up and drive her to a neutral, public place. However, when PETITT picked K.D. up, he drove only a little ways before he stopped to pick up WILLIAMS along the road. Upon WILLIAMS's instruction, PETITT drove them all to WILLIAMS' home in Little Elm, TX.

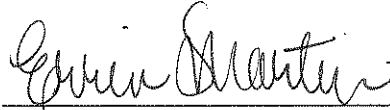
K.D. told him that she could not prostitute for him anymore because she was pregnant. WILLIAMS then directed PETITT to go to the store and purchase a pregnancy test. After she "failed" the pregnancy test, WILLIAMS violently beat K.D., urinated on her and ~~then choked her until she fainted~~. PETITT watched WILLIAMS pick up a cord from the computer and threaten to electrocute K.D. through her vagina. PETITT also

watched as WILLIAMS took a large knife, moved aside K.D.'s underwear, and began to penetrate K.D.'s vagina with the knife before PETITT suggested that WILLIAMS stop. After sending her upstairs to bathe and change out of the urine soaked clothes, WILLIAMS called K.D. into the living room for a meeting with himself, THOMAS and PETITT, and then he laid out their plan for continued success in the illegal transportation for prostitution scheme.

As alleged in Count One of the indictment, PETITT admits that he did intentionally and knowingly combine, conspire, confederate, and agree together and with WILLIAMS and THOMAS, and with others known and unknown, to transport individuals for the purpose of prostitution.

Agreed to and signed this 18<sup>th</sup> day of December, 2009.

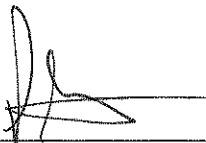
JAMES T. JACKS  
UNITED STATES ATTORNEY



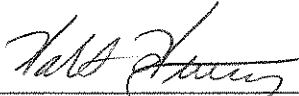
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